

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CASE  
ON THE EXHIBIT ATTACHED HERETO

**JOINT MOTION TO DISMISS DEFENDANT COLOPLAST CORP. WITH PREJUDICE**

Plaintiffs whose case is listed on the attached Exhibit A and defendant Coloplast Corp.<sup>1</sup> (“Coloplast”) advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims, and third-party claims. Accordingly, they jointly move the court to dismiss Coloplast as a defendant in this action with prejudice, and terminate Coloplast from the docket in this action, with the parties to bear their own costs. Other defendants remain in this action, and Plaintiffs will continue to prosecute this action against them.

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<sup>1</sup> Coloplast Corp. includes any incorrect or incomplete spellings of this Defendant, including Coloplast, Coloplast A/S, Coloplast Corporation, Coloplast Group, Coloplast Incorporated, Coloplast Manufacturing U.S., L.L.C., Coloplast Manufacturing U.S., LLC, Coloplast Manufacturing US, LLC, Coloplast Manufacturing, LLC, Coloplast Manufacturing, US LLC, Coloplast Manufacturing, US, L.L.C., Coloplast Manufacturing, US, LLC, and Coloplast, Inc.

Respectfully submitted,

/s/ Lana K. Varney

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*Attorney for Plaintiffs on Exhibit A*

Dated: October 11, 2016

**EXHIBIT A – WATERS & KRAUS**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-cv-15949	Diana J. Kurth, et al. v. Ethicon, Inc., et al.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ Lana K. Varney  
Lana K. Varney